

Joseph R. Saveri (State Bar No. 130064)
Steven N. Williams (State Bar No. 175489)
Cadio Zirpoli (State Bar No. 179108)
Christopher K.L. Young (State Bar No. 318371)
Louis A. Kessler (State Bar No. 243703)
Elissa A. Buchanan (State Bar No. 249996)
Travis Manfredi (State Bar No. 281779)

JOSEPH SAVERI LAW FIRM, LLP

601 California Street, Suite 1000

San Francisco, California 94108

Telephone: (415) 500-6800

Facsimile: (415) 395-9940

Email: jsaveri@saverilawfirm.com

swilliams@saverilawfirm.com

czirpoli@saverilawfirm.com

cyoung@saverilawfirm.com

lkessler@saverilawfirm.com

eabuchanan@saverilawfirm.com

tmanfredi@saverilawfirm.com

*Counsel for Individual and Representative
Plaintiffs and the Proposed Class*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

J. DOE 1, et al.,

Individual and Representative Plaintiffs,

v.

GITHUB, INC., et al.,

Defendants.

Case Nos. 4:22-cv-06823-JST
4:22-cv-07074-JST

**DECLARATION OF TRAVIS
MANFREDI IN SUPPORT OF
PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PORTIONS OF JOINT CASE
MANAGEMENT STATEMENT**

I, Travis Manfredi, declare as follows:

1. I am an attorney duly licensed to practice in the State of California. I am an associate at the Joseph Saveri Law Firm, LLP and counsel of record for Plaintiffs Does 1–5 in this action. I have personal knowledge of the matters stated herein and, if called upon, I could competently testify thereto. I make this declaration pursuant to 28 U.S.C. Section 1746 and Local Rule 79-5(c) in support of Plaintiffs’ Administrative Motion to File Under Seal Portions of the Joint Case Management Statement (“Sealing Motion”).

2. Plaintiffs have reviewed and complied with the Standing Order Governing Administrative Motions to File Materials Under Seal Before District Judge Jon S. Tigar.

3. Plaintiffs have reviewed and complied with Civil Local Rule 79-5. Plaintiffs’ redactions are narrowly tailored to seal only sealable material.

4. The following chart sets forth detail regarding the information Plaintiffs seek to file under seal and reason for sealing:

Reference	Description of Information	Reason for Sealing
JCMS page 9, lines 25–27	Descriptions of Plaintiffs’ code projects	This information would allow the public to determine Plaintiffs’ true identities. The Court has already determined it is appropriate for portions of Plaintiffs code to be filed under seal to protect their identities from being revealed. ECF No. 133.

1 Dated: September 12, 2023

By: /s/ Travis Manfredi
Travis Manfredi

3 Joseph R. Saveri (State Bar No. 130064)
4 Steven N. Williams (State Bar No. 175489)
5 Cadio Zirpoli (State Bar No. 179108)
6 Christopher K.L. Young (State Bar No. 318371)
7 Louis A. Kessler (State Bar No. 243703)
8 Elissa A. Buchanan (State Bar No. 249996)
9 Travis Manfredi (State Bar No. 281779)

10 **JOSEPH SAVERI LAW FIRM, LLP**
11 601 California Street, Suite 1000
12 San Francisco, California 94108
13 Telephone: (415) 500-6800
14 Facsimile: (415) 395-9940
15 Email: jsaveri@saverilawfirm.com
16 swilliams@saverilawfirm.com
17 czirpoli@saverilawfirm.com
18 cyoung@saverilawfirm.com
19 lkessler@saverilawfirm.com
20 eabuchanan@saverilawfirm.com
21 tmanfredi@saverilawfirm.com

22 Matthew Butterick (State Bar No. 250953)
23 1920 Hillhurst Avenue, #406
24 Los Angeles, CA 90027
25 Telephone: (323) 968-2632
26 Facsimile: (415) 395-9940
27 Email: mb@buttericklaw.com

28 *Counsel for Individual and Representative
Plaintiffs and the Proposed Class*